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through partnership

Steven Cooper

Direct Phone: +1 212 205 6027

Email: scooper@reedsmith.com

Reed Smith LLP
599 Lexington Avenue
New York, NY 10022-7650
+1 212 521 5400
Fax +1 212 521 5450
reedsmith.com

September 26, 2024

By CM/ECF

Hon. Pamela K. Chen
United States District Judge
Eastern District of New York
225 Cadman Plaza East, Courtroom 4F
Brooklyn, New York 11201

**Re: *PleasrDAO v. Shkreli*, Case No. 1:24-cv-04126 – Request to Extend Motion to Dismiss
Briefing Deadlines**

Dear Judge Chen:

We represent Plaintiff PleasrDAO in the above-referenced action. We write, with the consent of Defendant Martin Shkreli, and pursuant to Rule 1(F) of Your Honor's Individual Rules of Practice, to respectfully request an extension of Plaintiff's time to file an opposition to Defendant's September 13, 2024 Motion to Dismiss (the "Motion") and Defendant's time to file a reply in support of the Motion.

Under the Court's September 4, 2024 scheduling order, Plaintiff's deadline to file an opposition to the Motion (the "Opposition") is October 14, 2024, and Defendant's deadline to file a reply in support of the Motion (the "Reply") is November 4, 2024. We request a two-week extension of both deadlines, with proposed new deadlines of October 28, 2024 for the Opposition and November 18, 2024 for the Reply.

This is the first time either party has requested an extension of time for these deadlines under Rule 1(F) of Your Honor's Individual Rules of Practice. The extension will not impact any other deadlines set by the Court for this matter.

We thank the Court for its time and attention in this matter.

Respectfully submitted,

/s/ Steven Cooper

Steven Cooper

SC:rc